

Thank you for the opportunity to comment on the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks and A Notice of Proposed Rule Making (NPRM)

[http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/FCC-06-83A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-06-83A1.pdf) in EB Docket 06-119.

As a brief background, I have been a family physician for 30 years and a licensed amateur radio operator for 40 years. Having lived in northern Louisiana or New Orleans all my life, I am familiar with Katrina, Rita, previous storms and disasters, recent state and federal training, and have observed the events first hand in some situations. During the disaster last year, I had the opportunity to be involved with both health care needs as well as provide communications assistance prior to the storm, during the storm, and for several weeks after the storms. I have completed over 10 FEMA courses in the last few years and appreciate the complexity of tasks at hand.

I will not address every issue of concern, but will attempt to address several topics briefly following your headings.

#### **11. *Amateur Radio Service.***

Trained operators were not allowed to participate in many situations. Many were turned away initially and again later. Some did find their way to provide assistance in the impacted areas.

Many more could have participated, but were unable to be completely self-sufficient with housing, sanitation, security, nutrition, power, equipment, and transportation for 4-10 day shifts.

Because there is no state, regional, or national recognition or identification, other than the license from the FCC, the communications volunteer resource becomes a risk or threat, rather than an asset. Recognition of amateur radio by FEMA, and others, in more than a token fashion would allow the largest group of trained communicators, and a distributed resource, to do what they are trained to do and what they like to do. You have gone to the expense and trouble to license them to do just that, and the roadblocks continue to exist year after year.

You are well aware that amateur radio stood out as a source of successful communications in the involved areas from the documents "A Failure of Initiative" from the House of Representatives and "The Federal Response to Hurricane Katrina: Lessons Learned" from the White House.

One area of concern not specifically noted in this NPRM, which is currently under review by the FCC, concerns band use planning by mode and bandwidth. I do not have a magic solution, but know first hand that the ability to send messages in some digital format using modern day DSP devices and modes such as Pactor I, II, and III on HF is vastly superior to some other modes of operation. Having the ability to move 3 messages a minute anywhere in the world with or without email addresses is a real improvement in efficiency over the traditional FM, CW, and SSB nets, which performed very well. Having additional bandwidth areas of sufficient capacity to allow more automated digital systems to operate, would allow such efficiencies to be realized in the future.

### **III. First Responder Communications**

#### **A. Lack of Advanced Planning for Massive System Failures.**

It was described to the Panel that public safety officials plan for disasters but that Hurricane Katrina was a catastrophe.

Katrina type events have been studied for decades. The fact that some public officials and professionals were not ready is a serious issue not within the scope of the FCC.

#### **B. Lack of Interoperability.**

This is not new. The same concerns appear year after year after year. Billions have been spent with the same result. Some just don't learn.

## **RECOMMENDATIONS**

### ***3. Pre-positioning for FCC Regulatory Requirements – An A Priori Program for Disaster Areas –***

Having even more "official" tasks to do is not in the best interest of anyone. Either allow emergency activities to take place or don't. No one has time to go look up how to get particular documents completed and then have no way to transfer them to the appropriate governmental official. Remember the FCC is only one of many players in this game.

- i. Waiver of amateur radio and license exempt rules permitting transmissions necessary to meet essential communications needs.

The whole purpose of having a trained pool of educated and experienced operators is to have someone with those abilities. Taking a person with only an entry level knowledge and experience base, with the expectation that they will then be able to perform on the HF bands using modes and operational skills they have never experienced, is not likely to happen. If that were the case, then there is no need for amateur licensing at all. Let anyone operate anywhere in the RF spectrum as they see fit; not a good idea.

## **Recovery Coordination – Critical Steps for Addressing Existing Shortcomings and Maximizing Use of Existing Resources**

### ***1. Remedying Existing Shortcomings – National Credentialing Guidelines for Communications Infrastructure Providers –***

Amateur radio operators, or through various organizations, should be included. Many are already FEMA, NIMS, NRP, and ICS trained. Many are already screened by their local EOC or law enforcement agencies. They are a resource you license and certify. Put it into place.

### ***2. Remedying Existing Shortcomings – Emergency Responder Status for Communications Infrastructure Providers –***

Amateur radio operators or through organizations should be included.

### ***3. Remedying Existing Shortcomings – Utilization of State/Regional Coordination Bodies***

Amateur radio operators or through organizations should be included.

### ***4. Essential Steps in Addressing Lessons Learned Concerning Emergency Medical and Hospital Communications Needs – An Outreach Program to Educate and Include the Emergency Medical Community in Emergency Communications Preparedness –***

As a health care professional who has been involved in emergency planning in the past, efforts to train the “medical community” on each new communications system as each one comes into being, would be a full time endeavor. Health care professionals are overburdened with ever increasing demands. Asking them to take a day or two a year to be educated as communicators is not in the best interest of anyone. Trained

communicators are a much better resource to communicate and will allow nurses, EMT, physicians, and administrators to do their jobs.

Respectfully,

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